# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE DIET DRUGS (PHENTERMINE/FENFLURAMINE/ DEXFENEFLURAMINE) PRODUCTS LIABILITY LITIGATION

MDL DOCKET NO. 1203

BRENDA STALLINGS. MAXINE TALLY WHITECOMB. PRISCILLA BURNEY, MARY C. BUCHANAN, BETTY LOUANNE TOMLINSON, STEPHANIE BAILEY, BILLY CUPP, JR., PATRICIA STERLING, NORMA DEMPSEY HISAW, TABITHA M. WROTEN. WANDA J. THOMPSON, PEARL M. MCGEE, BARBARA J. JENKINS. SUSAN M. DAVIS. CATHERINE M. SHAFFER, EDSELL WILLIFORD, RAMONA JOHNSON, TAMMY HENDERSON, RICHARD D. EIFLING, MELISSA MILANO, LISA M GROSS, KAREN WASHINGTON-HACKMAN, ROBIN MCNEILL, JOHNNY EARL CLARK, SONIA YASHICA PRITCHARD, RUTH M WILLIAMS, ELAYNA COOPER, JACALYN T. JONES, WILLIAM A. WESTBROOK, MARSHA L. WRIGHT, PATRICIA LAVENDER, DONNA GAIL MORGAN, MAE WILSON, SUSAN WEST, CAROL P. WILSON, VIRGINIA A. LOGAN, VALERIE A. GIVENS-ROWAN, SHARON BALLINGER, TERETHA WILLIAMS, GERALDINE YOUNG SMITH, CAROLYN PRESTON, ANDREAN J. MONET AUTRY, HARRIET J. STEWART. BRUCE D. McMILLAN, CARRIE SIMPSON, JOHNNIE SMITH, MARY D. VARVIL, MENALONE A. JOHNSON, ANNIE STEVENSON, MARILYN BLANCH, EDWARD MCARTHUR, LATONYA THOMAS, LINDA ROGERS HARWELL, CHARLIE DOUGLAS, BERNICE GRIFFIN KIMBERLY S. ALFORD, MARILYN R. BLANCH, MARY SCHAEFER TIMMS, EDWARD McARTHUR, ANGELA TUCK REED, NATHANIEL WILLIAMS, JOHNIE BELINDA BROWN, THELMA B. GALES, AND CYNTHIA S. WINTERS

**PLAINTIFFS** 

VS. MDL CIVIL ACTION NO. 02-20081

WYETH-AYERST PHARMACEUTICALS, INC., f/k/a Wyeth-Ayerst Laboratories, Inc., a division of American Home Products, Inc.; WYETH LABORATORIES, INC., A. H. ROBINS COMPANY, INC.;

AMERICAN HOME PRODUCTS. INC.: ROY SMITH d/b/a STARKVILLE DISCOUNT DRUGS; WAL-MART ASSOCIATES, INC.; MCR PHARMACEUTICALS INC., a/k/a American Pharmaceuticals, Inc., a/k/a MCR/American Pharmaceuticals, Inc.; JONES MEDICAL INDUSTRIES, a/k/a Abana Pharmaceuticals, Inc.: QUALITEST PRODUCTS, INC.; EON LABS MANUFACTURING, INC.; FISONS CORPORATION; GATE PHARMACEUTICALS; INTERNEURON PHARMACEUTICALS. INC.: MEDEVA PHARMACEUTICALS, INC.; RUGBY LABORATORIES, INC.; SMITHKLINE BEECHAM CORPORATION; SEALE DRUG CO., INC.; G & M OF OXFORD; TYSON DRUGS, INC., and GOLDLINE LABORATORIES, INC., a division of IVAX Corporation

**DEFENDANTS** 

## PLAINTIFFS' DESIGNATION OF CASE SPECIFIC EXPERTS

Plaintiffs Brenda Stallings, et al., by and through counsel designate the following case specific expert witnesses:

Dr. Abdur Razzak Tai, Tri-County Doctors, Inc., 907 North Central Avenue, Kissimmee, Florida 34741 as a medical expert in the field of cardiology. A copy of Dr. Tai's experience, education, qualifications, and publications is attached hereto in the form of a curriculum vitae. Exhibit "A". Dr. Tai charges \$100.00 for echocardiogram interpretation and \$600.00 per hour for deposition and trial testimony. Dr. Tai does not maintain a record of his prior testimony.

Dr. Tai bases his opinion on his review and interpretation of the echocardiogram and doppler analysis performed on each Plaintiff, and his educational and experience as a cardiologist. A copy of Dr. Tai's signed report for each Plaintiff is attached hereto as cumulative Exhibit "B".

Dr. Tai may testify in the areas of cardiology; causation of Plaintiffs' medical condition and injuries and a description of the echocardiogram and doppler analysis performed on each Plaintiff and the results of that testing.

Dr. Tai is expected to testify that his review and interpretation of each Plaintiffs' echocardiogram and doppler analysis revealed that each Plaintiff suffered from the medical conditions listed in Dr. Tai's signed report for each Plaintiff as reflected in Exhibit "B". Dr. Tai's testimony is expected to be consistent with his interpretation and final conclusions indicated in his signed reports attached as Exhibit "B".

RESPECTFULLY SUBMITTED this the day of August, 2002.

BRENDA STALLINGS, MAXINE TALLY WHITECOMB, PRISCILLA BURNEY, MARY C. BUCHANAN, BETTY LOUANNE TOMLINSON, STEPHANIE BAILEY, BILLY CUPP, JR., PATRICIA STERLING, NORMA DEMPSEY HISAW, TABITHA M. WROTEN, WANDA J. THOMPSON, PEARL M. MCGEE, BARBARA J. JENKINS, SUSAN M. DAVIS, CATHERINE M. SHAFFER, EDSELL WILLIFORD, RAMONA JOHNSON, TAMMY HENDERSON, RICHARD D. EIFLING, MELISSA MILANO, LISA M GROSS, KAREN WASHINGTON-HACKMAN, ROBIN MCNEILL, JOHNNY EARL CLARK, SONIA YASHICA PRITCHARD, RUTH M WILLIAMS, ELAYNA COOPER, JACALYN T. JONES, WILLIAM A. WESTBROOK, MARSHA L. WRIGHT, PATRICIA LAVENDER, DONNA GAIL MORGAN, MAE WILSON, SUSAN WEST, CAROL P. WILSON, VIRGINIA A. LOGAN, VALERIE A. GIVENS-ROWAN, SHARON BALLINGER, TERETHA WILLIAMS, GERALDINE YOUNG SMITH, AROLYN PRESTON, ANDREAN J. MONET AUTRY, HARRIET J. STEWART, BRUCE D. McMILLAN, CARRIE SIMPSON, JOHNNIE SMITH, MARY D. VARVIL, MENALONE A. JOHNSON, ANNIE STEVENSON, MARILYN BLANCH, EDWARD MCARTHUR, LATONYA THOMAS, LINDA ROGERS HARWELL, CHARLIE DOUGLAS, BERNICE GRIFFIN, KIMBERLY S. ALFORD, MARILYN R. BLANCH, MARY

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### CERTIFICATE OF SERVICE

This is to certify that I have this day mailed a true and correct copy of the above and foregoing Plaintiffs' Designation of Generic Experts, postage prepaid, by means of United States Mail to the following counsel of record:

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